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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Valerie Ann Moroles,
Plaintiff,
vs.
Frank Bisignano, COMMISSIONER
OF SOCIAL SECURITY¹,
Defendant. }
} Case No. 1:25-cv-00809-KES-BAM
} STIPULATION AND ~~PROPOSED~~
} ORDER FOR EXTENSION OF
} TIME

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 38-day extension of time, from December 2, 2025 to January 9, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S

¹ Frank Bisignano became the Commissioner of Social Security on May 7, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Frank Bisignano should be substituted for Leland Dudek as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's
2 Scheduling Order shall be extended accordingly.

3 This is Plaintiff's second request for an extension of time. Plaintiff
4 respectfully states that the requested extension is necessary due several merit briefs
5 being due on the same week. For the weeks of November 24, 2025 and December
6 1, 2025, Plaintiff's Counsel has four merit briefs due and five reply briefs due.
7 Counsel requires additional time to brief the issues thoroughly for the Court's
8 consideration. Furthermore, this matter was recently assigned to undersigned
9 Counsel for the plaintiff. Additionally, there are intervening holidays, including
10 Thanksgiving Christmas and Hanukkah. Undersigned counsel also has preplanned
11 vacation during the last two weeks of December 2025. Defendant does not oppose
12 the requested extension. Counsel apologizes to the Defendant and Court for any
13 inconvenience this may cause.

14
15 Respectfully submitted,

16 Dated: November 26, 2025 PENA & BROMBERG, ATTORNEYS AT LAW
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18 By: /s/ Dolly M. Trompeter
19 DOLLY M. TROMPETER
20 Attorneys for Plaintiff

21
22 Dated: November 26, 2025 ERIC GRANT
23 United States Attorney
24 MATHEW W. PILE
25 Head of Program Litigation 1
26 Law & Policy
Social Security Administration

27 By: */s/ Oscar Gonzalez de Llano
28 Oscar Gonzalez de Llano

Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on November 26, 2025)

ORDER

Pursuant to the parties' joint stipulation (Doc. 17) and good cause having been shown, it is ORDERED that:

1. Plaintiff shall have a 38-day extension of time, from December 2, 2025 to January 9, 2025, for Plaintiff to serve Defendant with Plaintiff's Motion for Summary Judgment; and
 2. All other dates in the Court's Scheduling Order (Doc. 9) shall be extended accordingly.

IT IS SO ORDERED.

Dated: **December 1, 2025**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE